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**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In re

CASH CLOUD, INC.,  
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**DEBTOR'S OMNIBUS REPLY TO:**

**(A) OBJECTION OF BRINK'S  
INCORPORATED TO CONFIRMATION  
OF DEBTOR'S CHAPTER 11 PLAN AND  
RESERVATION OF RIGHTS; AND  
(B) ENIGMA SECURITIES LIMITED'S  
RESERVATION OF RIGHTS WITH  
RESPECT TO CONFIRMATION OF  
PLAN**

Hearing Date: July 27, 2023

Hearing Time: 1:30 p.m.

Cash Cloud, Inc. d/b/a Coin Cloud (the "Debtor"), debtor and debtor-in-possession in the above-captioned chapter 11 case (the "Chapter 11 Case"), by and through its undersigned counsel, Fox Rothschild LLP, hereby files the Debtor's *Omnibus Reply* to: (A) the *Objection of Brink's Incorporated to Confirmation of Debtor's Chapter 11 Plan and Reservation of Rights* [ECF No. 838] (the "Brink's Objection") filed by Brink's Incorporated ("Brink's"); and (B) *Enigma Securities*

1 *Limited's Reservation of Rights with Respect to Confirmation of Plan* [ECF No. 834] (the "Enigma  
 2 Reservation") filed by Enigma Securities Limited ("Enigma"), both with respect to confirmation of  
 3 *Debtor's Chapter 11 Plan of Reorganization Dated May 8, 2023* [ECF No. 528] (the "Plan").<sup>1</sup>

4 This Reply is based on the Plan, the *Declaration of Daniel Ayala* (the "Ayala Declaration")  
 5 filed concurrently herewith, the papers and pleadings on file in the Chapter 11 Case, any arguments  
 6 that the Court may entertain at the hearing, and the following:

7 **A. Brink's Objection.**

8 1. In its Objection, Brink's argues that it never received \$629,695 for pre-petition  
 9 services that the Debtor was authorized to pay it under the Court's *Final Order on the Critical Vendor*  
 10 *Motion* [ECF No. 319], and it is entitled to an administrative expense claim in that amount. Brink's  
 11 asserts that it intends to file a proof of claim for an administrative expense claim by the July 20, 2023  
 12 Administrative Claims Bar Date. Whether or not Brink's is entitled to an administrative expense  
 13 claim and in what amount will be determined in the claims resolution process, not in the Plan  
 14 confirmation process, and Brink's arguments in support of its purposed administrative expense claim  
 15 are not relevant here.

16 2. Brink's argues next that the liquidation analysis attached as Exhibit B to the  
 17 *Supplement to [the Plan]* [ECF No. 821] shows that the projected administrative expense claims  
 18 exceed the amount of sale proceeds [see ECF No. 795], and therefore the Plan cannot be confirmed  
 19 in compliance with section 1129(a)(9) of the Bankruptcy Code. For this reason, among others,  
 20 Debtor intends to file an Amended Plan that will make the Effective Date contingent upon Debtor  
 21 having enough Cash assets to pay all administrative expense claims in full. Ayala Declaration, ¶ 4.  
 22 Debtor and the Committee are in discussions with Debtor's secured creditors regarding modification  
 23 of the Plan's treatment of their claims in light of the sale, and intend to file the Amended Plan (and  
 24 continue the confirmation hearing) shortly. Ayala Declaration, ¶ 4.

25  
 26  
 27  
 28 <sup>1</sup> Capitalized terms not defined herein have the meanings ascribed to them in the Plan.

1 **B. Enigma Reservation.**

2 3. Enigma's Reservation notes that it will be providing Debtor with comments to the  
3 Amended Plan and that the Plan Supplement may be subject to further supplementation or revision.  
4 To the extent any issues it raises cannot be consensually resolved, Enigma reserves its rights to object  
5 to the Amended Plan, the Plan Supplement and the Surcharge Claims. Debtor has no objection to  
6 Enigma's Reservation.

7 **WHEREFORE**, based on the reasons provided above and the Amended Plan to be filed  
8 shortly, Debtor respectfully requests that the Court overrule the Brink's Objection.

9 Dated this 20th day of July 2023.

10 **FOX ROTHSCHILD LLP**

11 By: /s/Brett A. Axelrod  
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